

x:\ats52136\adoption

ROGER P. McTIERNAN, JR. (RPM 1680)
BARRY, McTIERNAN & MOORE
2 Rector Street – 14th Floor
New York, New York 10006
(212) 313-3600

Attorneys for Defendants ANN TAYLOR STORES CORPORATION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION

-----X
CARLOS PINELA AND CIOTILDE PINELA,

Plaintiff,

-against-

**NOTICE OF
ADOPTION**

07 CV 05377

ALAN KASMAN DBA KASCO, AMERICAN
EXPRESS BANK, LTD, AMERICAN EXPRESS
COMPANY, AMERICAN EXPRESS TRAVEL
RELATED SERVICES COMPANY, INC., ANN
TAYLOR STORES CORPORATION, BATTERY PARK
CITY AUTHORITY, BFP TOWER C CO. LLC., BFP
TOWER C MM LLC., BLACKMON-MOORING-
STEAMATIC CATASTOPHE, INC. D/B/A BMS CAT,
BROOKFIELD FINANCIAL PROPERTIES, INC.,
BROOKFIELD FINANCIAL PROPERTIES, LP,
BROOKFIELD PARTNERS, LP, BROOKFIELD
PROPERTIES CORPORATION, BROOKFIELD
PROPERTIES HOLDINGS INC., ENVIROTECH
CLEAN AIR, INC., GPS ENVIRONMENTAL
CONSULTANTS, INC., HILLMAN
ENVIRONMENTAL GROUP, LLC., INDOOR
ENVIRONMENTAL TECHNOLOGY, INC., KASCO
RESTORATION SERVICES CO., LEHMAN
BROTHERS HOLDINGS INC., LEHMAN BROTHERS,
INC., LEHMAN COMMERCIAL PAPER, INC.,
MCCLIER CORPORATION, MERRILL LYNCH & CO
INC., NOMURA HOLDING AMERICA, INC.,
NOMURA SECURITIES INTERNATIONAL, INC.,
STRUCTURE TONE (UK), INC., STRUCTURE TONE
GLOBAL SERVICES, INC., TOSCORP INC.,

TRAMMELL CROW COMPANY, TRAMMEL CROW
CORPORATE SERVICES, INC., TUCKER ANTHONY,
INC., WESTON SOLUTIONS, INC., WFP RETAIL CO.
G.P. CORP., WFP RETAIL CO. L.P., WFP TOWER A
CO., WFP TOWER A CO. G.P. CORP., WFP TOWER A.
CO., L.P., WFP TOWER B CO. G.P. CORP., WFP
TOWER B HOLDING CO., LP, AND WFP TOWER B.
CO., L.P., ET AL.,

Defendants.

-----X

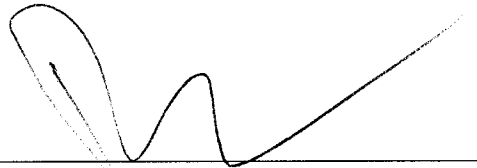
PLEASE TAKE NOTICE that defendants, ANN TAYLOR STORES
CORPORATION, as and for their responses to the allegations set forth in the Complaint
by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-
referenced action, hereby adopts ANN TAYLOR STORES CORPORATION's Answer
to the Master Complaint dated August 8, 2007, which was filed in the matter of *In Re*
World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH).

To the extent that ANN TAYLOR STORES CORPORATION's Answer to the
Master Complaint does not comprehensively address any of the specific allegations
within the Check-Off Complaint in the above-captioned matter, ANN TAYLOR
STORES CORPORATION denies knowledge or information sufficient to form a belief
as to the truth of such specific allegations.

WHEREFORE, ANN TAYLOR STORES CORPORATION, demands judgment
dismissing the above-captioned action as against it, together with its costs and

disbursements.

Dated: New York, New York
December 12, 2007

A handwritten signature in black ink, appearing to read 'R. McTiernan, Jr.', is written over a horizontal line.

ROGER P. McTIERNAN, JR. (RPM 1680)
BARRY, McTIERNAN & MOORE
Attorneys for Defendants
ANN TAYLOR STORES CORPORATION
2 Rector Street – 14th Floor
New York, New York 10006
(212) 313-3600

TO:

WORBY GRONER EDELMAN & NAPOLI BERN, LLP
Attorneys for Plaintiff
115 Broadway, 12th Floor
New York, New York 10006
212-267-3700